

LAWLER, METZGER & MILKMAN, LLC

1909 K STREET, NW  
SUITE 820  
WASHINGTON, D.C. 20006

CHARLES W. LOGAN  
DIRECT (202) 777-7724

PHONE (202) 777-7700  
FACSIMILE (202) 777-7763

November 8, 2000

**By Hand**

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
12th Street Lobby, TW-A-325  
Washington, D.C. 20554

Re: Request for Extension of Time to File Report on  
E911 Phase II Implementation Plan  
WPQL237 -- Chicago 20 MHz, LLC  
CC Docket No. 94-102

RECEIVED  
NOV 8 2000  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Ms. Salas:

Chicago 20 MHz, LLC, the licensee of PCS station WPQL237, hereby requests an extension of the deadline to file its E911 Phase II implementation report for this station. This report is currently due November 9, 2000. Chicago 20 MHz, LLC, which has temporarily been placed into a divestiture trust, requests that this deadline be extended until 45 days after it has been transferred to a third party from the trust.

As a condition of approval of the merger of Bell Atlantic Corporation ("Bell Atlantic") and GTE Corporation ("GTE"), the Commission and the U.S. Department of Justice ("DOJ") required the divestiture of certain cellular and PCS licenses. To afford themselves sufficient time to divest the licenses properly and so as not to delay closing of the merger, Bell Atlantic and GTE, with Vodafone AirTouch Plc and Joseph J. Simons, Esq., as Trustee ("Trustee"), sought consent from the Commission and the DOJ to transfer control of or assign such licenses to a divestiture trust administered by the Trustee. On June 26, 2000, the Commission issued an Order granting this consent. *In re Applications of GTE Corporation, Vodafone AirTouch PLC, and Bell Atlantic Corporation For Consent to Transfer Control of or Assign Properties to Divestiture Trust and For Temporary Waiver of the CMRS Spectrum Cap Rule*, Order, DA 00-1414 (June 26, 2000) ("Order").

Pursuant to the Commission's Order, control of Chicago 20 MHz, LLC, licensee of WPQL237, was transferred to the Trustee on August 29, 2000. The Order requires the Trustee to divest this PCS license to a third party within 180 days of being placed in trust. On August 28, 2000, the Commission granted its consent to transfer control of WPQL237 to BGV License Company, LLC. *See Public Notice*, DA 00-1973 (released Aug. 28, 2000).

No. of Copies rec'd 071  
List ABCDE

Chicago 20 MHz, LLC will therefore be within the control of the Trustee for only a temporary period of time, and will be transferred to a third party well before the deadlines established by the Commission for wireless carriers to deploy E911 Phase II systems. The Trustee consequently requests that the Commissions extend the deadline for Chicago 20 MHz, LLC to file its E911 Phase II implementation report until 45 days after control over WPQL237 has been transferred to a third party from the trust. This will permit a full and complete E911 Phase II implementation report to be filed by the party that will have control over WPQL237 when these new E911 requirements go into effect in 2001.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles W. Logan", with a long horizontal flourish extending to the right.

Charles W. Logan

*Counsel for Joseph J. Simons, Trustee*

cc: Blaise Scinto